

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN THE MATTER OF:**

**IVELISSE RIVERA PADILLA**

**Debtor(s)**

**CASE NO. 17-01782-BKT**

**CHAPTER 13**

**MOTION FOR CONTINUANCE OR IMPOSITION OF THE AUTOMATIC STAY  
PURSUANT TO § 362(c)(3)(B)**

TO THE HONORABLE COURT:

NOW COMES debtor(s) through the undersigned attorney and very respectfully prays and alleges:

1. The present petition for relief under Chapter 13 of the Bankruptcy Code was filed on March 15, 2017.

2. Debtor's previous bankruptcy petition, case number 16-1079-BKT, was dismissed on December 15, 2016. Please see docket 31.

3. In view of the fact that Section 362 (c) (3) limits Section 362(a) in the present case the Automatic Stay should be extended due to the following:

4. Said case(s) was dismissed due to the following excusable circumstances:

Debtor fell in arrears due to loss of income because she was a solo practitioner, which depleted her funds to make payments.

5. At present Debtor(s) income comes from employment that is steady and she can comply with the new payment plan.

6. The present case has been filed in good faith and the circumstances which caused the previous dismissal do not exist at present. Debtor(s)' financial situation has stabilized and she is in a much better position to comply with the present case's proposed plan.

7. Furthermore, if the present case is dismissed or the Automatic Stay under Section 362 of the Bankruptcy Code is not extended for the life of the plan, debtor(s) will suffer irreparable harm,

loss and damages since he will not be able to protect her motor vehicle.

**WHEREFORE**, it is respectfully requested that this Honorable Court takes notice of the aforementioned and allow Debtor to continue with the present case with the Automatic Stay extended to all creditors for the life of the plan with any other appropriate relief.

**NOTICE:** Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this March 16, 2017.

**CERTIFICATE OF SERVICE:** I hereby certify that on this same date the foregoing motion was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants, and through U.S Mail, first class postage prepaid, to all creditors in the attached mailing matrix.

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Label Matrix for local noticing  
0104-3  
Case 17-01782-BKT13  
District of Puerto Rico  
Old San Juan  
Thu Mar 16 15:59:43 AST 2017

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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